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Dear EPA Administrator Jackson, USEPA, and Collaborative U.S. Agencies:

The U.S. Environmental Protection Agency tests chemicals for their capacity to act as endocrine disruptors. This is a good idea. Some chemicals disturb hormone function, potentially damaging animal growth and reproduction.

EPA chemical screens will also kill 80,000 animals over a span of years. This is a bad idea. I urge EPA to update its protocols. Some tests — like "lethal dose 50%" to measure how much chemical kills half the animals dosed with it — date back to the 1920s! Draize tests from the 1940s still drip toxins into a rabbit's clipped-open eyes or smear corrosives on shaved skin to assess eye-skin irritation.

Please replace old-fashioned animal models with human-focused research tools for EPA's Endocrine Disruptor Screening Program (EDSP).

Reactivity assays can gauge endocrine disruptors and reproductive toxicity — without subjecting tens of thousands of animals to pain and death. In fact, EPA has already invested millions in development of these "innovative methods" for its Computational Toxicology Research Program, ToxCast™. EPA recognizes "quantitative high-throughput screening (qHTS) assays" as key in the evaluation of toxic pathways. It cites published research about the efficacy of animal-free assays.

Yet rather than embrace its own program, EPA has turned down 90 percent of pesticide company requests to utilize ToxCast in vitro tests in place of animals. The agency prefers to duplicate the same old animal tests in what amounts to an enormous waste of time and money. Animal experimentation is unlikely to help EPA safeguard humans or the environment.

Please let chemical testers use ToxCast to screen for endocrine disruption. If nothing else, ToxCast should rank chemicals according to significance and cut animal use to a bare minimum. Starting now.

Thank you,